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8 **UNITED STATES DISTRICT COURT**
9 **DISTRICT OF NEVADA**

10 UNITED STATES OF AMERICA,) CASE NO. 2:15-cr-0320-KJD(PAL)
11)
12 Plaintiff,)
13)
14 vs.)
15 ABDIEL ARMENTA VEGA,)
Defendant.)

16 **DEFENDANT'S UNOPPOSED MOTION FOR APPROVAL TO TRAVEL**

17 The Defendant, ABDIEL ARMENTA VEGA, hereby petitions this Court for an
18 Order allowing him to travel from his home in Chicago, Illinois to Southern California
19 between the dates of July 1, 2007 and July 6, 2017 for work related purposes. This
20 request is based upon the attached Memorandum, together with all the papers and
21 pleadings on file, and any argument if the Court determines an argument is necessary for
22 the determination of this request.

23 DATED this 21st day of June, 2017.

24 DANIEL J. ALBREGTS, LTD.

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26 By: /s/ Daniel J. Albregts
Daniel J. Albregts, Esq.
Nevada Bar No. 004435
27 Attorney for Defendant VEGA
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1 **MEMORANDUM**

2 On November 2, 2015 the defendant appeared for his initial appearance shortly
3 after his arrest on the charges contained in the Indictment. At that time, the Government
4 did not seek Vega's detention and he was thereafter released on a personal recognizance
5 bond with various conditions, including pretrial supervision. Counsel has spoken with
6 Vega's current supervising officer, Judith Lesh from the Northern District of Illinois, who
7 confirms that Vega has been compliant with all the terms and conditions of his release
8 since he was placed on supervision. She further confirmed that Vega is on e-reporting,
9 and reports every month. Finally, she authorized counsel to inform the Court she has no
10 objection to Vega traveling to Southern California during these dates for the purposes of
11 potential employment.

12 Specifically, Vega will be attending tryouts for an independent professional baseball
13 team based in Southern Illinois, his home state. The tryout is being held in Southern
14 California rather than Southern Illinois. Vega has provided his pretrial officer and counsel
15 information regarding the tryout. If Vega is successful, he would have better employment
16 at least through the Summer of 2017.

17 Counsel has spoken with the prosecutor assigned to this matter who has indicated
18 he has no objection to this request. Given that this travel request is unopposed by the
19 Government or Vega's Pretrial Officer, the defense would respectfully request that this
20 Court grant this request and allow Vega to travel to Southern California between the dates
21 of July 1, 2017 and July 6, 2017.

22 DATED this 21st day of June, 2017.

23 DANIEL J. ALBREGTS, LTD.

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25 By: /s/ Daniel J. Albregts
26 Daniel J. Albregts, Esq.
27 Nevada Bar No. 004435
28 Attorney for Defendant VEGA

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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

UNITED STATES OF AMERICA,)
Plaintiff,)
vs.)
ABDIEL ARMENTA VEGA,)
Defendant.)


CASE NO. 2:15-cr-0320-KJD(PAL)

ORDER ALLOWING TRAVEL

Based upon the foregoing Defendant's Unopposed Motion for Approval to Travel,
and good cause appearing therefore,

IT IS HEREBY ORDERED that Defendant Vega is allowed to travel to Southern
California between July 1, 2017 and July 6, 2017.

DATED this 22nd day of June, 2017.


United States ~~District~~ Magistrate Judge